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January 22, 2018

BY ECF

The Honorable Valerie E. Caproni
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: SEC v. Penn, et al., No. 14 Civ. 0581 (VEC)

Dear Judge Caproni:

I write as counsel for defendants, specifically, Camelot Acquisitions: Secondary Opportunities Management, LLC and The Camelot Group International, LLC, requesting relief pursuant to Section 11 of the United States District Court, Southern District of New York Electronic Case Filing Rules & Instructions, as a Technical Failure occurred while attempting to file the referenced Motion to Quash, on January 19, 2018.

Specifically, I encountered technical difficulties accessing the ECF system and uploading the motion with exhibits, to the same. As I was unable to access the ECF system due to technical failure on January 19th, I attempted re-file the Motion to Quash on the morning of January 20, 2018 and was successful. As a result, I am respectfully asking the Court to deem the motion timely, as filed, due to the aforementioned circumstances. A grant of the relief requested does not appear to prejudice the parties in the action.

Respectfully submitted,



Orr & Brown, P.C.
Ian D. Orr, Esq.

cc: Lawrence E. Penn III (by ECF)
Howard Fischer, SEC (by ECF)